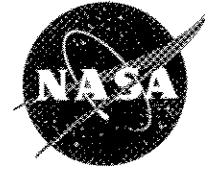


National Aeronautics and Space Administration  
**Headquarters**  
Washington, DC 20546-0001



December 2, 2008

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Invitation to the 2008 Arianespace Annual Holiday Reception on  
December 4, 2008

NASA employees attending the reception have received an invitation to attend an Annual Holiday Reception hosted by Arianespace, Inc., on December 4, 2008, beginning at 6:30 p.m., at the Homer Building, Washington, D. C.

This event will be a widely-attended gathering of aerospace industry representatives, members of Congress, NASA employees, and members of the Federal government. The sponsor has specifically valued the cost of the "light reception" to be \$110 per person and approximately 550 individuals have been invited to attend. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I have determined that the attendance of NASA employees at the Arianespace event is in the interests of the Agency because it will further Agency programs and operations. Attendance at this event will allow discussion of issues of mutual interest with international and national business and government leaders, and will support NASA's statutory mandate to disseminate information concerning its activities and results.

Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. NASA employees whose duties may substantially affect Arianespace, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i), regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone". The signature is fluid and cursive, with a large, stylized "A" and "G".

Adam F. Greenstone